



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
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COMPLIANCE AND ENFORCEMENT

Reply to: OCE-127

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James Cagle, Risk Manager - EHS
Nu-West Industries, Inc.
Agrium Conda Phosphate Operations
3010 Conda Road
Soda Springs, Idaho 83276

Re: Groundwater Sampling Methods
Administrative Order on Consent for Nu-West Industries, Inc.;
Idaho Facility, Docket No. RCRA-10-2009-0186

Dear Mr. Cagle:

I have been reviewing past groundwater sampling reports in advance of our upcoming meeting this March, and noted that analytical results have been reported as "Dissolved Metals (mg/l)". The Report on Work Plan for Additional Requirements dated April 26, 2012, reports "Dissolved Metals (mg/l)" in Tables 3-3 and 5-1. The report does not state whether or not the groundwater samples were filtered prior to analyses for metals, radiological, or other parameters.

The Work Plan for Additional Requirements dated July 11, 2011 does not contain any provisions for the filtration of groundwater samples prior to analyses. However, the Addendum to the Work Plan for Additional Requirements dated June 29, 2012 includes the following statement under standard operating procedure 3.9.1:

Filtered groundwater samples are sometimes used for field kit analyses and should only be collected for laboratory use after approval from the appropriate agency and/or project manager. If filtration is necessary, the following procedures should be followed and all observations and measurements recorded in the field book.

EPA has not received any requests from Nu-West Industries ("Nu-West") to filter groundwater samples prior to laboratory analyses for metals, radiological, or other parameters. I checked with the Idaho Department of Environmental Quality (IDEQ), and they have not received any such requests either.

The Quality Assurance Project Plan (QAPP) dated June 29, 2010 states the following in section 1.4:

A summary of the groundwater testing program is presented in the Work Plan. The chemical analytical results for the groundwater samples will be compared to Idaho Primary and Secondary Constituent Standards for groundwater and EPA Maximum Contaminant Levels (MCLs). The radiological results will be compared to Idaho and EPA Drinking Water Standards (40 CFR 9, 141, and 142).

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The federal maximum contaminant levels (MCLs) for each metal present in groundwater is based on a total concentration for each metal. Filtering of groundwater samples has the potential for removing material, including some amount of the metals present. The reported values of metals present in the groundwater would therefore be only that amount in the dissolved phase.

Since neither EPA nor the IDEQ have received any requests from Nu-West for filtration of groundwater samples collected prior to laboratory analysis, and certain data has been reported as "dissolved metals", it is not clear to EPA if groundwater sampling analysis has been conducted on a total concentration basis for the different metals, radiological, and other parameters.

Were any of the groundwater samples that were collected pursuant to the work carried out under the Work Plan for Additional Requirements (including addendums to the work plan), filtered prior to sealing of the sample containers and shipment to the laboratory for analyses? If so, please clarify which samples were filtered and what size filter was used.

It is EPA's expectation that groundwater analysis of samples collected pursuant to the work being carried out in accordance with the A-34 Lateral Assessment Work Plan and other work plans is to be done on a total concentration basis for each constituent, and that Nu-West will contact EPA for approval in advance of any groundwater sample filtering.

Should you have any questions, I may be reached at (206) 553-2964. Alternatively, you may reach me via email at: Magolske.Peter@epamail.epa.gov. Thank you for your attention to this important matter.

Sincerely,



Peter Magolske
Air and RCRA Compliance Unit

cc: Brian Monson, Idaho Department of Environmental Quality
P. Scott Burton, Esq. Hunton and Williams LLP
Timothy J. Carlstedt, Esq. Hunton and Williams LLP